

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

UNITED STATES OF AMERICA, )  
                                )  
Plaintiff,                 )  
                                )  
v.                            ) No. 4:19-CR-00888-SRC-NCC  
                                )  
LANCE BROWN,              )  
                                )  
Defendant.                 )

**UNITED STATES' SECOND SUPPLEMENTAL FILING IN RESPONSE TO DEFENSE  
MOTION FOR TEMPORARY RELEASE**

The United States of America, through undersigned counsel, hereby files this supplemental response to Defendant Lance Brown's motion to permit temporary release. See Docs. #88 and 90. The Government is in receipt of documentation from the St. Charles County Jail concerning the policies and procedures that have been implemented in response to the COVID-19 pandemic. This includes the SCCDOC Operational Plan and staff/inmate screening documents. *See* Government Exhibits 2, 3, & 4. The purpose of these policies and procedures are to ensure, to the greatest extent possible, that infected persons do not introduce the virus to the jail population. Moreover, these policies and procedures determine the course of action in the event that an inmate and/or staff exhibits symptoms and/or tests positive for Coronavirus.

In addition to these exhibits, the Government has had numerous discussions with the St. Charles County Jail staff, who have informed as to the implemented policies and procedures. The Government discussed a number of these procedures in its original response (Doc. #89), including a mandatory 14-day segregation for new inmates and the suspension of outside visitors with the exception of legal counsel. Further procedures include:

- a. The building has a single point of entry for staff, who undergo a medical screening immediately upon entering the front door. Inmates are screened in the booking sallyport by the nursing staff prior to accepting custody of the inmate. *See Exhibits 3 & 4.*
- b. Rolling temperature checks: Inmates undergo rolling temperature checks throughout the day. Every day, a different housing unit has their temperatures checked and recorded.
- c. Isolation Unit: If, in the future, an inmate tests positive for COVID-19, they will be housed in an isolation unit separate from the general population. They will remain in this unit for the duration of their illness. Staff members testing positive will be quarantined at their homes and not allowed to return until the Health Department approves said return.

The Government confirmed with the St. Charles County Jail that as of April 21, 2020, no inmate has tested positive and the isolation unit has not required utilization.

Respectfully submitted,

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United States Attorney

/s/ Geoffrey S. Ogden  
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#### **CERTIFICATE OF SERVICE**

I hereby certify that on April 21, 2020, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon all counsel of record.

/s/ Geoffrey S. Ogden  
GEOFFREY S. OGDEN, #66930MO  
Assistant United States Attorney